

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
GREENVILLE DIVISION**

**RIKA JONES, ESTATE OF ROBERT
LOGGINS, ET AL.**

PLAINTIFFS

VS.

CIVIL ACTION NO. 4:20-CV-220-SA-JMV

JUSTIN GAMMAGE, ET AL.

DEFENDANTS

**MUNICIPAL DEFENDANTS' MOTION FOR JUDGMENT ON THE PLEADINGS OR,
ALTERNATIVELY, FOR SUMMARY JUDGMENT**

Municipal Defendants the City of Grenada, Justin Gammage, Reggie Woodall, Edwin Merriman, and Michael Jones (“Municipal Defendants”) move to dismiss Plaintiffs Rika Jones, as Administratrix of the Estate of Robert Loggins; Rika Jones, individually and on behalf of the wrongful death beneficiaries of Robert Loggins, deceased; and Rika Jones, as mother and next friend of R.D.L., a minor’s (“Plaintiffs”) Fourth Amended Complaint pursuant to Federal Rule of Civil Procedure 12(c) or, alternatively, pursuant to Federal Rule of Civil Procedure 56. The contemporaneously filed memorandum in support explains in detail the bases for the requested relief, including that the deceased did not suffer a constitutional violation, the standards of municipal liability have not been met, Plaintiffs cannot overcome qualified immunity, the state law claims are barred by the Mississippi Tort Claims Act, and the claim for punitive damages against the City is barred under federal and state law.

In addition to the memorandum, Municipal Defendants offer the following exhibits in support:

Exhibit “A” – Justin Gammage MBI Interview Transcript

Exhibit “B” – Reggie Woodall MBI Interview Transcript

Exhibit “C” – Arrest History (filed under seal pursuant to Order [88])

Exhibit “D” – Albert Tilley MBI Interview Transcript

Exhibit “E” – Initial 911 Call (filed conventionally)

Exhibit “F” – Woodall Body Cam Video (filed conventionally)

Exhibit “G” – Merriman Body Cam Video (filed conventionally)

Exhibit “H” – John Watson MBI Interview Transcript

Exhibit “I” – Jail Video (filed conventionally)

Exhibit “J” – 911 Calls from Jail (filed conventionally)

Exhibit “K” – Autopsy Report

Exhibit “L” – Toxicology Report

Exhibit “M” – Michael Jones MBI Interview Transcript

Exhibit “N” Jerome Johnson MBI Interview Transcript

Exhibit “O” – Training Certifications

Exhibit “P” – Chancery Court Order

For the reasons articulated in the memorandum, Municipal Defendants respectfully request an order of dismissal.

Dated: March 23, 2021

Respectfully submitted,

PHELPS DUNBAR, LLP

BY: /s/ G. Todd Butler

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**ATTORNEYS FOR MUNICIPAL
DEFENDANTS**

CERTIFICATE OF SERVICE

I certify that, on March 23, 2021, I had a copy of this document electronically filed with the Clerk of the Court, using the CM/ECF system, which sent notification of such filing to all counsel of record.

/s/ G. Todd Butler

G. TODD BUTLER